

1 THE HONORABLE JAMES L. ROBART
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9
10 UNITED STATES DISTRICT COURT
11 WESTERN DISTRICT OF WASHINGTON
12 AT SEATTLE

13 MICROSOFT CORPORATION,

14 Plaintiff,

15 v.

16 MOTOROLA, INC., et al.,

17 Defendants.

18 MOTOROLA MOBILITY, INC., et al.,

19 Plaintiffs,

20 v.

21 MICROSOFT CORPORATION,

22 Defendant.

23 Case No. C10-1823-JLR

24 **DECLARATION OF CHRISTOPHER
25 WILSON IN SUPPORT OF
MICROSOFT'S RESPONSIVE CLAIM
CONSTRUCTION BRIEF ON ITS '780
AND '582 COUNTERCLAIM PATENTS**

26 **"WILSON II DECL."**

27 DECLARATION OF CHRISTOPHER WILSON
28 IN SUPPORT OF MICROSOFT'S RESPONSIVE
29 CLAIM CONSTRUCTION BRIEF ON ITS '780
30 AND '582 COUNTERCLAIM PATENTS - I
31 Case No. C10-1823-JLR

32 LAW OFFICES
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1 I, Christopher Wilson, declare the following:

2 1. I am an attorney licensed to practice law in the state of California and am an
 3 Associate at the law firm of Sidley Austin LLP, counsel for Microsoft Corporation (“Microsoft”)
 4 in the above-referenced matter. I make this Declaration in support of Microsoft’s Responsive
 5 Claim Construction Brief on Its ’780 and ’582 Counterclaim Patents (the “Brief”). I have
 6 personal knowledge of the facts stated below or know of such facts from my review of the case
 7 file, and if called upon to testify, could and would testify to each of them.

8 2. Attached to this declaration are 3 exhibits used to support statements made in the
 9 Brief. The following is a listing of these exhibits.

10 3. Exhibit R¹ is Microsoft’s infringement contentions chart for the ’780 patent. This
 11 document was originally served on Motorola on September 2, 2011 as Exhibit A to Microsoft’s
 12 Asserted Claims and Preliminary Infringement Contentions. This exhibit is a true and accurate
 13 representation of the document it purports to show.

14 4. Exhibit S is Motorola’s non-infringement contentions for the ’780 patent. This
 15 document was originally served on Microsoft on December 2, 2011 as Tab A to Motorola’s
 16 Preliminary Non-Infringement Contentions. The highlighting in the exhibit was added by
 17 Microsoft’s counsel and is not part of the original document. Other than the highlighting, this
 18 exhibit is a true and accurate representation of the document it purports to show.

19 5. Exhibit T is titled “A Dictionary of Modern Legal Usage, Second Edition,”
 20 authored by Bryan Garner, and published in 2001. In particular, this exhibit includes page 307
 21 of this document. The term “e.g.” has been highlighted (by a red bordered box). The
 22 highlighting in the exhibit was added by Microsoft’s counsel and is not part of the original

23 ¹ The lettering sequence of the exhibits is continued from the previous Declaration of
 24 Christopher Wilson in Support of Microsoft’s Opening Claim Construction Brief on Its ’780 and
 25 ’582 Counterclaim Patents (Mar. 30, 2012) [ECF No. 224]. The previous Declaration described
 26 Exhibits A through Q; accordingly, the current Declaration picks up this sequence at “R.”

1 document. Other than the highlighting, this exhibit is a true and accurate representation of the
2 document it purports to show.

3 I declare under penalty of perjury under the laws of the United States of America that the
4 foregoing is true and correct. Executed on May 18, 2012.

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6 
7 CHRISTOPHER WILSON

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DECLARATION OF CHRISTOPHER WILSON
IN SUPPORT OF MICROSOFT'S RESPONSIVE
CLAIM CONSTRUCTION BRIEF ON ITS '780
AND '582 COUNTERCLAIM PATENTS - 3
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EXHIBITS

Ex. R: Microsoft's infringement contentions for the '780 patent (Sept. 2, 2011)

Ex. S: Motorola's non-infringement contentions for the '780 patent (Dec. 2, 2011)

Ex. T: Bryan Garner, *A Dictionary of Modern Legal Usage* (2d ed. 2001) (entry for “e.g.”)

DECLARATION OF CHRISTOPHER WILSON
IN SUPPORT OF MICROSOFT'S RESPONSIVE
CLAIM CONSTRUCTION BRIEF ON ITS '780
AND '582 COUNTERCLAIM PATENTS - 4
Case No. C10-1823-JLR

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CERTIFICATE OF SERVICE

I, Linda Bledsoe, swear under penalty of perjury under the laws of the State of Washington to the following:

1. I am over the age of 21 and not a party to this action.
2. On the 18th day of May, 2012, I caused the preceding document to be served on counsel of record in the following manner:

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5 DATED this 18th day of May, 2012.

7 s/ Linda Bledsoe
8 LINDA BLEDSOE

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